## REMARKS

Claims 1-69 are pending in the present application. Reconsideration of the claims is respectfully requested.

### I.    35 U.S.C. § 102, Anticipation

The examiner has rejected claims 1-6, 8-18, 20-29, 31-41, 43-52, 54-64, 66-69 under 35 U.S.C. § 102 as being anticipated by Watson. This rejection is respectfully traversed.

> As per claims 1, 25 and 48 Watson discloses a method for processing foreign protocol requests across a system area network, the method comprising:
> - A receiving a request from a device utilizing a protocol which is foreign to a protocol utilized by the system area network; [0004]
> - Encapsulating the request in a data packet; and [0005], [0041]
> - Sending the data packet to a requested node via the system area network fabric. [0005]

Claim 1 is reproduced for purposes of discussion.

1.    (Original) A method for processing foreign protocol requests across a system area network, the method comprising:

receiving a request from a device utilizing a protocol which is foreign to a protocol utilized by the system area network;

encapsulating the request in a data packet; and

sending the data packet to a requested node via the system area network fabric.

The Examiner rejects all independent claims (i.e., claims 1, 18, 24, 41, 47, and 64) under the same rationale, citing the Watson reference. In rejecting the claims, Examiner cites paragraphs 0004, 0005, and 0041 of Watson. Paragraphs 0004-0005 state:

In one general aspect, electronic data are transferred by receiving subsequent requests from the client to access a communications system at a first geographic location from a client located at a second geographic location remote from the first geographic location; identifying a proxy local to the client in the second geographic location; and receiving subsequent data requests from the client at the proxy.

Implementations may include one or more of the following features. For example, the data requests may be encapsulated in a tunneling protocol at a proxy. The tunneling proxy may include a user datagram protocol. Implementations may also include determining whether the data requests can be satisfied by electronic data stored in a cache at the second geographic location; sending the data requests to the Internet; retrieving electronic data responsive to the data requests at the proxy; storing electronic data responsive to the data requests in a cache at the second geographic location; performing filtering of electronic data at the proxy according to user-defined preferences; and transferring electronic data responsive to the data requests to the client form the proxy.

These paragraphs appear to teach that when a client attempts to request data from a remote location, the client does so by using a proxy local to the client. Further, the cited paragraphs appear to teach that the proxy may be checked to see if its cache contains the requested information, thereby alleviating the need to make the request from the more distant server.

These passages do not appear to teach the claimed limitations of, "receiving a request from a device utilizing a protocol which is foreign to a protocol utilized by the system area network," as claimed in claim 1. This position is supported by referring to a later part of Watson, namely Figure 4, also cited by Examiner.

Figure 4 is described at paragraphs 36 and 37 of Watson:

[0036] Examples of each element within the communication system of FIG. 4 are broadly described with respect to FIGs. 1-3. In particularthe client system 405 and the communications link 415 typically have attributes comparable to those described with respect to client system 105, 205, and 305 and communications links 115, 215, and 315 of FIGs. 1-3. ...

[0037] The client system 405 includes a client device 420 and a client controller 425. The client controller 425 is generally capable of establishing a connection to the host system 410, including the OSP host complex 480, the IM host complex 490 and/or the Internet 465. In one implementation, the client controller 425 includes an OSP application for communicating with servers in the OSP host

complex 480 using exclusive OSP protocols. The client controller 425 may also include applications, such as an IM client application, and/or an Internet browser application, for communicating with the IN host complex 490 and the Internet 465.

[Emphasis added.]

This passage indicates that the client in Watson is equipped with the necessary applications to send information to the OSP host complex "using exclusive OSP protocols." Thus, the client of the Watson reference need not have its request encapsulated and translated, nor is the client request a "protocol which is foreign to a protocol utilized by the system area network." Hence, it is respectfully submitted that Watson does not teach the claimed limitation of, "receiving a request from a device utilizing a protocol which is foreign to a protocol utilized by the system area network...." The client of Watson transmits its request in the protocol of the OSP host complex, as stated in Watson.

Examiner also cites paratraph 0041 of Watson, which states:

In the implementation of FIG. 4, the OSP host complex 480 includes a routing processor 4802. In general, the routing processor 4802 will examine an address field of a data request, use a mapping table to determine the appropriate destination for the data request, and direct the data request to the appropriate destination. In a packet-based implementation, the client system 405 may generate information requests, convert the requests into data packets, sequence the data packets, perform error checking and other packet-switching techniques, and transmit the data packets to the routing processor 4802.

[Emphasis added.]

Again, the cited passage of Watson teaches that the client system first converts the request into packet data, etc., which necessarily occurs before the request is received at the host. This passage therefore does not teach the claimed limitations of claim 1, namely, "receiving a request from a device utilizing a protocol which is foreign to a protocol utilized by the system area network; encapsulating the request in a data packet...." For example, claim 1 claims first "receiving" the request where the request is

in a foreign protocol, then encapsulating the request in a data packet.... But Watson teaches that the client "convert[s] the request into data packets", which necessarily occurs before the client sends the request.

Hence, it is respectfully submitted that the limitations of claim 1 are not taught by the Watson reference.

Likewise, the other independent claims are rejected over the same reference as claim 1, and are therefore also believed distinguished from the cited reference.

Since all independent claims are believed distinguished, all dependent claims are also believed allowable at least by virtue of their dependence on allowable claims. However, several of the dependent claims are also believed allowable on their own merit.

For example, claim 5 states:

5.      The method as recited in claim 4, wherein the data packet is a first data packet and further comprising:
        receiving, at the host channel adapter, an end of interrupt instruction;
        encapsulating the end of interrupt instruction into a second data packet; and
        transmitting the second data packet to the target channel adapter via the system area network fabric.

As discussed above, this claim indicates that data (an end of interrupt instruction in this case) is first received at the SAN, then is encapsulated into a second data packet. This is not taught by Watson, because Watson teaches that the client converts the request into data packets before the request is sent.

It is noted that Watson's teaching requires that the client be equipped with special software to translate the request into data packets, for example, while the present invention is dedicated to processing foreign protocol requests. While Watson teaches that the requests are translated before they are sent, requiring the requestor to do the work of translation, the present invention allows a foreign requestor to make a request without needing specialized software to translate the request.

For the above reasons, it is respectfully submitted that all claims are distinguished form the cited references. Favorable reconsideration is respectfully requested.
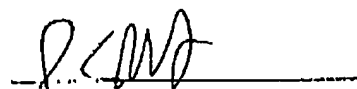
## II.  Conclusion

It is respectfully urged that the subject application is patentable over Watson and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: _10, 29, 03_

Respectfully submitted,

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